

United States District Court

for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

Jose Angel Ramos-Jimenez,
Felix Alejandro Favela-Santamaria, and
Guadalupe Ortiz Rodriguez

Case No: M-16-172 -BMJ

FILED
JUN 02 2016

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY: NO DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count 1

On or about June 1, 2016, within the Western District of Oklahoma, the defendant(s) **Jose Angel Ramos-Jimenez, Felix Alejandro Favela-Santamaria, and Guadalupe Ortiz Rodriguez** violated:

*Code Section**Offense Description*

21:846

Knowingly conspired with each other to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count 2

On or about June 1, 2016, within the Western District of Oklahoma, the defendant(s) **Jose Angel Ramos-Jimenez and Felix Alejandro Favela-Santamaria**, violated:

*Code Section**Offense Description*

21:841(a)(1)

Knowingly possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Colby Cason, Drug Enforcement Administration, which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.

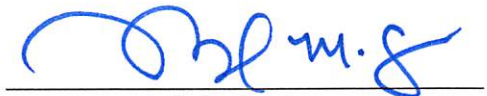


Complainant's signature
COLBY CASON
Special Agent
Drug Enforcement Administration

Sworn to before me and signed in my presence.

Date: 6/2/16

City and State: Oklahoma City, Oklahoma



Judge's signature
BERNARD M. JONES, U.S Magistrate Judge

AFFIDAVIT OF SPECIAL AGENT COLBY CASON

DRUG ENFORCEMENT ADMINISTRATION

1. I, Colby J. Cason, being first duly sworn, do depose and state that: I am a Special Agent with the Drug Enforcement Administration (DEA), currently assigned to the DEA District Office in Oklahoma City, Oklahoma. As such, I am an investigative and law enforcement officer of the United States authorized to conduct investigations of, and to make arrests and seizures for, offenses enumerated in the Controlled Substances Act Title 21, United States Code.

2. I have been a law enforcement officer since 1997, and a DEA Special Agent (S/A) since June, 2004. After successfully completing the DEA Basic Agent training academy at Quantico, Virginia, I was assigned to the Chicago Field Division from September 2004 until July of 2006, when I transferred to the Oklahoma City, Oklahoma District Office. Prior to becoming a DEA S/A, I was a State Trooper with the Oklahoma Highway Patrol, serving approximately 2 years as a patrolman and five years in Special Operations Criminal Intelligence Division. My knowledge of information contained in this affidavit is from my direct participation and discussions with other agents directly involved in this investigation. The facts contained in this affidavit are offered to establish probable cause, and do not represent every fact known to myself or other participating agents.

3. This Affidavit is submitted in support of an application for an Arrest Warrant for Jose Angel RAMOS-Jimenez, Felix Alejandro FAVELA-Santamaria and Guadalupe Ortiz RODRIGUEZ for conspiracy to possess with intent to distribute and to

distribute 500 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and did possess with intent to distribute 500 grams or more of the same mixture in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

4. On May 26, 2016, SA Colby Cason and Task Force Officer (TFO) Patty Figueroa received reliable information from an undercover agent relating to a Hispanic male using the cellular telephone number (702) 497-4350 who was to receive approximately 31 kilograms of methamphetamine in Oklahoma City, Oklahoma on June 1, 2016. On May 28, 2016, Oklahoma County District Judge Donald Deason authorized a “ping” warrant for the cellular telephone number (702) 497-4350, hereafter referred to as “Target Phone 1.” This warrant was activated by Cingular Wireless on May 29, 2016, and was continuously monitored by case agents and indicated that the user of the cell phone was in Dallas, Texas in an area populated with several hotels.

5. On June 1, 2016, at approximately 10:15 a.m., the pings indicated that the user of the Target Phone 1 was northbound on Interstate 35, north of Ardmore, Oklahoma. At approximately 11:27 a.m., the ping indicated Target Phone 1 was still northbound on Interstate 35 at/near Indian Hills Road, Norman, Oklahoma. Surveillance agents were dispatched along Interstate 35 and at approximately 12:20 p.m., the ping indicated that Target Phone 1 was currently located in the IHOP restaurant located at 1421 South Air Depot, Midwest City, Oklahoma. While in the restaurant, Target Phone 1 was called by agents, who were able to observe a Hispanic male, later identified as Jose RAMOS-Jimenez, answer the phone. RAMOS-Jimenez was accompanied by Felix

Alejandro FAVELA-Santamaria. The duo arrived in a white Jeep Cherokee bearing Durango Mexico plate GBU8916. It should be noted, law enforcement indices were queried and indicated the vehicle had a border crossing on May 23, 2016, in Laredo, Texas, and passed through a border checkpoint that same day with no known owner listed. The vehicle had two other prior crossings at the same point of entry since February of 2016.

6. At approximately 12:45 p.m., agents observed RAMOS-Jimenez and FAVELA-Santamaria exit the restaurant and depart in the white Jeep where they were followed by agents to the Flying J Truck stop located at 701 South Morgan Road, Oklahoma City, Oklahoma. At approximately 1:49 p.m., agents observed RAMOS-Jimenez enter the Flying J restaurant. At approximately 1:39 p.m., agents observed the white Jeep pull near a tractor trailer, where a large black duffle bag, which appeared to be heavy and cumbersome, and based on your Affiant's experience was consistent with a 31 kilogram quantity of methamphetamine. It was loaded into the white Jeep by RAMOS-Jimenez. Shortly thereafter, the white Jeep, occupied by RAMOS-Jimenez and FAVELA-Santamaria, exited the Flying J followed by surveillance agents.

7. At approximately 2:27 p.m., RAMOS-Jimenez and FAVELA-Santamaria, were arrested in the La Quinta Inn parking lot located at 5653 Tinker Diagonal, Midwest City, Oklahoma. Agents recovered a large black duffle back containing 25 kilogram-sized bundles, wrapped in a manner consistent with drug trafficking. One bundle was removed which was field tested positive for methamphetamine and weighed in excess of 500 grams.

8. During a post-*Miranda* statement, RAMOS-Jimenez stated he was in Oklahoma City to pick up the seized methamphetamine from an unknown truck driver and deliver to an unknown individual in Oklahoma City, Oklahoma. RAMOS-Jimenez advised he was being directed by an unknown male in Oklahoma City using a Tulsa phone number, and was waiting for an address to deliver it to. RAMOS-Jimenez was directed to deliver the methamphetamine to a residence located at 5120 Oakcliff Drive, Oklahoma City, Oklahoma. RAMOS-Jimenez further added that he had to pay FAVELA-Santamaria money in order for FAVELA-Santamaria to assist with the drug transaction.

9. During a post-*Miranda* statement, FAVELA-Santamaria stated he had no information to provide regarding the seizure of the methamphetamine. FAVELA-Santamaria stated he was just a passenger of RAMOS-Jimenez's when they traveled to a truck stop where an unknown man gave them a large black duffle bag. Your Affiant knows it is usual for drug couriers to travel in pairs for security reasons. Furthermore, FAVELA-Santamaria was within earshot of the drug conversations with Ramos-Jimenez and others directing the delivery of the methamphetamine.

10. Surveillance agents were then dispatched to 5120 Oakcliff Drive, Oklahoma City, Oklahoma. At approximately 6:52 p.m., agents observed a white Nissan Altima bearing Oklahoma license plate 793-HDL pull up to the driveway. A Hispanic female, later identified as Guadalupe Ortiz RODRIGUEZ, was observed to exit the driver side of the vehicle and enter the residence through the front door. Shortly thereafter, a juvenile wearing pink shorts and a white tank top exited the passenger side of the vehicle

and entered the residence.

11. At approximately 7:02 p.m., the white Jeep Cherokee, occupied by an undercover agent, RAMOS-Jimenez, and the black duffle bag arrived at 5120 Oakcliff Drive, Oklahoma City, Oklahoma. A few minutes later, the garage door opened and RODRIGUEZ exited the residence on the phone. At this time RAMOS-Jimenez exited the passenger side of the vehicle and opened the rear cargo door of the jeep. RAMOS-Jimenez was then observed pulling out the black duffle bag, and placed it on the ground in front of him. RODRIGUEZ then motioned to RAMOS-Jimenez at the white Jeep to come towards the garage. RAMOS-Jimenez then carried the bag and placed it on the floor at the garage entry. RODRIGUEZ then went inside the residence through the garage entry and shortly thereafter returned with a plastic sack and handed it to RAMOS-Jimenez. RAMOS-Jimenez then returned to the rear cargo area of the Jeep. At this time RODRIGUEZ was placed under arrest.

12. During a post-*Miranda* statement, RODRIGUEZ stated she was directed by an unknown male to drop off money to another unknown male at 5120 Oakcliff Drive, Oklahoma City, Oklahoma. RODRIGUEZ possessed keys to the residence from an individual she would not identify and stated she does have uncontrolled access to it. RODRIGUEZ continued to be vague and elusive during the interview; however, she did grant consent to agents to search the residence. The residence was a rental and vacant and was in the process of being renovated. RODRIGUEZ indicated she retrieved the sack full of U.S. currency from underneath a kitchen cabinet (Your Affiant believes there is in excess of \$70,000). The sack was open and the currency clearly visible to anyone

holding it.

13. In summary, based upon my training and experience as a law enforcement officer, it is my opinion that there is probable cause to believe that Jose Angel RAMOS-Jimenez, Felix Alejandro FAVELA-Santamaria and Guadalupe Ortiz RODRIGUEZ conspired to possess with intent to distribute and to distribute 500 grams or more of a mixture or substance that contained a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and did possess with the intent to distribute 500 grams or more of the same mixture in violation of Title 21, United States Code, Sections 841(a)1 and 846.


COLBY J. CASON
Special Agent
Drug Enforcement Administration

Subscribed and sworn to before me in my presence on this 2nd day of June,
2016.


BERNARD M. JONES
United States Magistrate Judge